

This application seeks the permanent modification of Mr. Lewis's above-stated bail conditions, removing the curfew enforced by electronic monitoring. The reason for this request is that Mr. Lewis has found a new job with overnight work hours. We request the removal of the curfew condition to accommodate the overnight work hours of Mr. Lewis's new job; so that Mr. Lewis will be able to spend time with his daughter; and in light of Mr. Lewis's consistent compliance with his bail conditions and Pretrial Services. In the event that the Court grants this request, all other bail conditions will remain unchanged.

Based upon my communications with A.U.S.A. Samuel P. Rothschild and Pretrial Services Officer Joshua Rothman, the Government and Pretrial Services consent to this request.

Therefore, for the reasons stated herein, we respectfully request that the Court grant this application modifying Mr. Lewis's bail conditions.

We thank the Court for its attention to this matter.

Respectfully submitted,

/s/ Richard J. Ma

Richard J. Ma, Esq.

cc: A.U.S.A. Samuel P. Rothschild (via email)
P.T.S. Officer Joshua Rothman (via email)